

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

J.T. INDIVIDUALLY AND ON BEHALF OF D.T.;
K.M. INDIVIDUALLY AND ON BEHALF OF
M.M. AND S.M.; J.J., INDIVIDUALLY AND ON
BEHALF OF Z.J.; C.N., INDIVIDUALLY AND ON
BEHALF OF V.N., AND, ALL OTHERS
SIMILARLY SITUATED

Plaintiffs,

V.

BILL DE BLASIO, IN HIS OFFICIAL CAPACITY
AS THE MAYOR OF NEW YORK CITY;
RICHARD CARRANZA, IN HIS OFFICIAL
CAPACITY AS THE CHANCELLOR OF NEW
YORK CITY DEPARTMENT OF EDUCATION;
THE NEW YORK CITY DEPARTMENT OF
EDUCATION; THE SCHOOL DISTRICTS IN THE
UNITED STATES; AND STATE DEPARTMENTS
OF EDUCATION IN THE UNITED STATES

Defendants

CIVIL ACTION

Case No. 1:20cv-05878(CM)

SEPTEMBER 2, 2020

AFFIRMATION OF BRYAN L. LeCLERC
PRO HAC VICE

I, Bryan L. LeClerc, of full age, duly certify as follows:

1. I am an attorney at law duly admitted in the State of Connecticut, and a partner with the law firm of Berchem Moses PC, attorneys for several defendants, and in such capacity I am fully familiar with the facts of the within matter.

2. I am a member in good standing of the Connecticut Bar. ID#306933.

3. I am a member in good standing of the New York Bar. ID#2207033.

4. I am admitted to practice before the Southern District of New York.

5. I have never been disciplined or suspended from the practice of law.

6. Should my partner Ryan P. Driscoll be admitted *pro hac vice* to represent

school districts, I will oversee his work and ensure compliance with all Rules governing the U.S. District Court for the Southern District of New York, including all disciplinary rules.

7. I hereby request that the Court admit Ryan P. Driscoll *pro hac vice* for the purpose of appearing, participating and representing the Norwalk Board of Education, the Bridgeport Board of Education, the Stamford Board of Education, the Stratford Board of Education and any other School Districts on whose behalf our firm may be retained over the coming weeks to provide representation in this lawsuit.


WHEREFORE, the undersigned respectfully requests that this Court grant an Order allowing the admission, *pro hac vice* of Ryan P. Driscoll, Esq. to the United States District Court for the Southern District of New York to practice with respect to the above-captioned action, together with such other and further relief as the Court may deem just and proper.

DATED: Milford, Connecticut

September 2, 2020


Bryan L. LeClerc

Subscribed and sworn to before me this 2nd day of September, 2020.


Commissioner of the Superior Court
Notary Public Richard C. Bukantz